

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VIRGINIA PELLEGRINI, et al.

CASE NO. 07-CV-02497-CRB

Plaintiff(s),

v.
TECHNICHEM, INC., et al.

STIPULATION AND [PROPOSED]
ORDER SELECTING ADR PROCESS

Defendant(s).

_____ /

Counsel report that they have met and conferred regarding ADR and have reached the following stipulation pursuant to Civil L.R. 16-8 and ADR L.R. 3-5:

The parties agree to participate in the following ADR process:

Court Processes:

- Non-binding Arbitration (ADR L.R. 4)
- ✓ Early Neutral Evaluation (ENE) (ADR L.R. 5)
- Mediation (ADR L.R. 6)

(Note: Parties who believe that an early settlement conference with a Magistrate Judge is appreciably more likely to meet their needs than any other form of ADR, must participate in an ADR phone conference and may not file this form. They must instead file a Notice of Need for ADR Phone Conference. See Civil Local Rule 16-8 and ADR L.R. 3-5)

Private Process:

Private ADR (please identify process and provider) _____

The parties agree to hold the ADR session by:

- ✓ the presumptive deadline (*The deadline is 90 days from the date of the order referring the case to an ADR process unless otherwise ordered.*)

other requested deadline _____

Dated: 8/6/07 _____

Dated: 8/6/07 _____

/s/ Anna L. Nguyen
Attorney for Plaintiff

Paul A. Henreid
Attorney for Defendant

Paul Henreid

[PROPOSED] ORDER

Pursuant to the Stipulation above, the captioned matter is hereby referred to:

- Non-binding Arbitration
- ✓ Early Neutral Evaluation (ENE)
- Mediation
- Private ADR

Deadline for ADR session

- ✓ 90 days from the date of this order.
- other

IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE

BRIAN M. LEDGER (SBN: 156942)
bledger@gordonrees.com

PAUL HENREID (SBN: 214527)
phenreid@gordonrees.com

GORDON & REES LLP
101 West Broadway, Suite 1600
San Diego, CA 92101
Telephone: (619) 696-6700
Facsimile: (619) 696-7124

Attorneys For: Defendants
TECHNICHEM, INC., A CALIFORNIA CORPORATION; MARK J. NG, AN
INDIVIDUAL; STEPHEN S. TUNG, AN INDIVIDUAL

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

VIRGINIA PELLEGRINI, Trustee of the
Mario J. and Virginia E. Pellegrini Trust,
and VIRGINIA PELLEGRINI, an
individual,

Plaintiff,

vs.

TECHNICHEM, INC., a California
corporation, MARK J. NG, an
individual; STEPHEN S. TUNG, an
individual,

Defendants.

CASE NO.

PROOF OF SERVICE

Complaint filed: May 9, 2007
Trial Date: **

Gordon & Rees LLP
101 West Broadway
Suite 1600
San Diego, CA 92101

I, the undersigned, say: I am over 18 years of age, employed in the County
of San Diego, California, in which the within-mentioned service occurred; and that
I am not a party to the subject cause. My business address is 101 West Broadway,
Suite 1600, San Diego, California 92101.

I hereby certify that on August 6, 2007, a copy of the foregoing documents
listed below were filed electronically:

**1. STIPULATION AND [PROPOSED] ORDER SELECTING ADR
PROCESS**

1
2 Notice of this filing will be sent by operation of the Court's electronic filing
3 system to the following parties which are indicated on the electronic filing receipt.

4 Anna L. Nguyen (SBN: 226829)
5 Wactor & Wick LLP
6 180 Grand Avenue, Suite 950
7 Oakland, CA 94612-3572
8 Ph: (510) 465-5750
9 Fax: (510) 465-5697

10 I declare that I am employed in the offices of a member of the bar of this
11 court whose direction the service was made.

12 I declare under penalty of perjury under the laws of the State of California
13 that the foregoing is true and correct. Executed on August 6, 2007.

14 
15 Sharon Daubert

Gordon & Rees LLP
101 West Broadway
Suite 1600
San Diego, CA 92101

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